

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

STEVE HUTKINS
SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS HAGENSTEIN

(May 19, 2021)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit these additional interrogatories and requests for production of documents to United States Postal Service witness Stephen B. Hagenstein.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

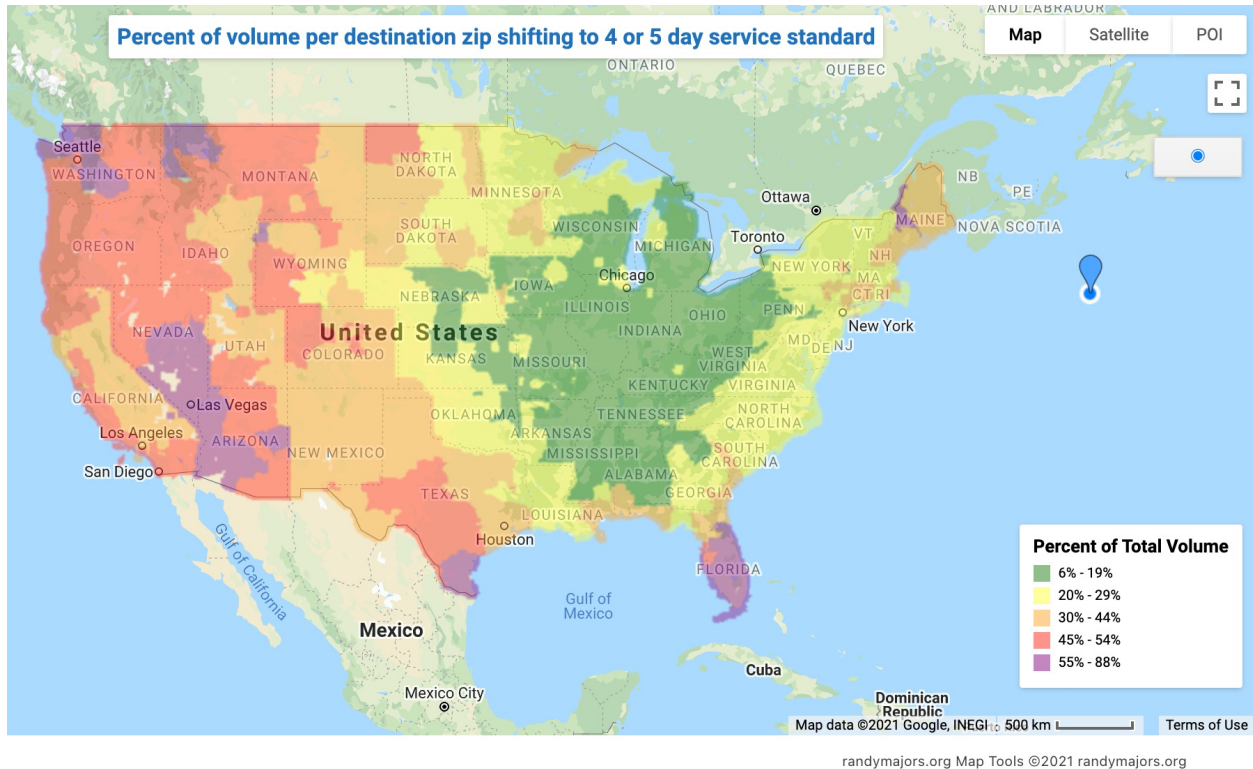
The instructions contained in my interrogatories to witness Hagenstein, SH/USPS-T-3-6-8, are incorporated herein by reference.

Respectfully submitted,

Dated: May 19, 2021

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SH/USPS-T-3-6. Please consider the following map showing the percent of total volumes per destination 3-digit zip code that will be shifting to a 4- or 5-day service standard under the Postal Service's proposal.¹ Please confirm that the map appears to be a reasonably accurate representation of what will occur under the plan, e.g., recipients who live in the western part of the country (as well as portions of Florida and Maine) will see a much larger percentage of their mail volumes shifted to a 4- or 5-day service standard than those living in the eastern half. If not confirmed, please explain.



SH/USPS-T-3-7. Please discuss why the proposed changes will not result in unfair and undue discrimination against users of the mail who live in areas where mail volumes subject to a 4 or 5-day standard will be significantly greater (in terms of percentages) than in other areas.

SH/USPS-T-3-8. Has the Postal Service commissioned any technical studies by outside consulting or market research companies on service standards since 2012 (i.e.,

¹ The data set used to create this map was derived from USPS-LR-N2021-1-3, Excel sheet entitled "3_Zip3_OD_Pairs.xlsx," by totaling the volumes for 4 and 5-day pairs for each 3-digit zip. This data can be found on Google Drive at <https://bit.ly/3v300CN>. The map was created using a mapping tool at [randymajors.org](https://bit.ly/3ouLHV3). For closer inspection, an interactive version of the map can be found at <https://bit.ly/3ouLHV3>.

subsequent to the market research studies done for the changes reviewed in Docket No. 2012-1 concerning Network Rationalization)? If so, please share the studies and results.